

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America

v.

Felipe Arturo Avalos-Mejia
(a.k.a. "Raul Soto Mejia"; "Pollo";
"Felipe Arturo Avalos-Mexia";
"Manuel Zamorano-Rameriz"; and
"Manuel Martinez")

CRIMINAL COMPLAINT

CASE NUMBER: 24-4194 MJ CDB

I, the undersigned complainant, being duly sworn, state that the following is true and correct to the best of my knowledge and belief:

On or about the date described in Attachment A in the County of Coconino in the District of Arizona and elsewhere, the defendant committed the crime of Possession or Receipt of Goods Stolen from Interstate Shipment, Aid and Abet, in violation of Title 18, United States Code (U.S.C.) §§ 659 and 2, offense described as follows:

See Attachment A, Description of Count

I further state that I am a Special Agent for Homeland Security Investigations (HSI) and that this complaint is based on the following facts:

See Attachment B, Statement of Probable Cause, Incorporated by Reference Herein.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

AUTHORIZED BY: Addison Owen, AUSA



Digitally signed by
ADDISON OWEN
Date: 2024.06.23 14:26:49
-07'00'

Chris Foster, SA for HSI

Name of Complainant

Chris Foster 06-23-2024

Signature of Complainant

Sworn to telephonically before me

June 23, 2024

Date

at

Flagstaff, Arizona

City and State

HONORABLE CAMILLE D. BIBLES

United States Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

ATTACHMENT A
DESCRIPTION OF COUNT
COUNT 1

Theft from Interstate Shipment

On about and between June 8, 2023 and June 21, 2024, in the District of Arizona and elsewhere, Defendant FELIPE ARTURO AVALOS-MEJIA knowingly aided and abetted known and unknown individuals in the possession of goods and chattels, to wit: Nike Shoes, of a value in excess of \$1000.00, which had been stolen from a Burlington Northern Santa Fe train while moving in interstate commerce from California to Arizona, knowing the said goods and chattels to be stolen.

All in violation of Title 18, United State Code, Sections 659 and 2.

ATTACHMENT B

STATEMENT OF PROBABLE CAUSE

I, Chris Foster, a Special Agent for Homeland Security Investigations (HSI), being duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with HSI and have been so employed since December 1997. I have a Bachelor of Science in Criminal Justice from California State University Sacramento. I am a law enforcement officer of the United States, and I am empowered by law to conduct criminal investigations, make arrests, and serve search and arrest warrants.

2. As a Special Agent with HSI, your Affiant investigates criminal violations of United States law, including import and export violations, controlled substances law violations, and money laundering violations. Your Affiant has participated in hundreds of investigations involving stolen vehicle organizations, theft ring investigations, possession, manufacture, distribution, and importation of controlled substances, as well as methods used to finance drug transactions. As an HSI Special Agent, your Affiant has been trained in conducting narcotics and money laundering investigations and received specialized training concerning violations of the Controlled Substances Act contained within Title 21 of the United States Code. I am currently assigned to the HSI Flagstaff Office located in Flagstaff, Arizona, where we investigate transnational criminal organizations to include money laundering and drug trafficking organizations operating throughout the United States.

3. By virtue of my employment as a Special Agent, your Affiant has performed various tasks, which include, but are not limited to:

- a. functioning as a surveillance agent, thus observing and recording movements of persons involved in violations of United States Code as well as violations of Arizona State law;

- b. interviewing witnesses, confidential reliable informants (CIs) and sources of information (SOI) relative to the violations of United States Code as well as violations of Arizona State law;
- c. functioning as a case agent, entailing the supervision of specific investigations involving various crimes throughout the United States; and
- d. conducting complex investigations involving transnational criminal organizations committing various crimes throughout the United States.

4. I have consulted with other experienced investigators concerning the practices of transnational criminal organizations and the best methods of investigating them. In preparing this affidavit, I have conferred with other Special Agents and law enforcement officers. Furthermore, I have personal knowledge of the following facts or have learned them from the individual(s) mentioned herein.

5. Based on the below facts, your Affiant submits there is probable cause that Felipe Arturo AVALOS-MEJIA committed the crime of Possession or Receipt of Goods Stolen from Interstate Shipment, Aid and Abet, in violation of Title 18, United States Code (U.S.C.) §§ 659 and 2.

BACKGROUND

6. Over the past fifteen years, several Transnational Criminal Theft Organizations have been burglarizing Burlington Northern Santa Fe (BNSF) Railway as well as Union Pacific trains throughout the Southwest of the United States to include Arizona. These organizations consist primarily of Mexican citizens from the Mexican State of Sinaloa who operate out of Arizona and California, with extensive connections throughout California, Arizona, and New Mexico. The train burglaries have increased in frequency over the past two years.

7. The suspects usually scout high value containers on the BNSF railway on Eastbound trains that parallel Interstate 40 near Needles, California. Once the organization targets a particular train of interest, they typically find a location for several train burglars to get on the train. Once on the train, the burglars open container doors while the train is

moving and target merchandise to steal such as electronics, tools, and footwear. The burglars often target containers with visible high-security locks and use reciprocating saws, bolt-cutters, or similar tools to defeat the locking mechanisms. Once the burglars target a specific container that has desirable merchandise, the burglars on the train communicate with follow vehicles utilizing cellular devices, and those follow vehicles surveil the train until it stops, or the burglars will cause the train to stop to unload the freight. The suspects often cut the train braking system air hose, which causes the train to go into an emergency stop (commonly referred to as “UDE”), which is a sudden and dramatic application of all the brakes on the train. By cutting an air hose, the burglars can control when and where the train is stopped to unload the cargo they target to burglarize. This act is very dangerous and can cause a train to derail, which could ultimately cause serious injury or death to BNSF employees or citizens. The suspects have also sabotaged the train signal system by cutting the locks off signal boxes and then by cutting the control wires inside. This is also a dangerous act that creates dark areas on the rail network, requiring non-traditional train dispatching functions and extensive repairs. High-value trains travel at speeds up to 70 MPH on multiple tracks in both east and west directions. The train crews and train dispatchers rely on the signals for safe transportation.

8. Once the burglars unload the merchandise from the container that is on the train, the burglars often hide the product in fields or brush adjacent to the BNSF tracks to conceal it until it can be picked up later. The location of the stolen merchandise is then shared by the train burglars with the use of cellular devices to the surveillance crew who are following the train. The organization will then send box trucks to pick up the stolen merchandise if law enforcement is not detected. The box trucks used by the organization often were found to have been stolen with their Vehicle Identification Number (VIN) swapped. Once the stolen merchandise has been picked up, it is usually transported to California where it is sold or fenced to wholesale online retailers such as third-party Amazon and eBay resellers.

CURRENT INVESTIGATION

9. Felipe Arturo AVALOS-MEJIA, known as “Pollo,” is currently operating as a coordinator for a Transnational Criminal Theft Organization operating out of Phoenix, Arizona, and Los Angeles, California. Based on prior and re-occurring law enforcement contact as far back as 2016, it is believed that AVALOS-MEJIA has been involved in burglarizing BNSF trains for over eleven years. Presently, AVALOS-MEJIA controls crews that have been burglarizing BNSF Eastbound Trains and stealing millions of dollars of merchandise each year while the trains are in route from Needles, California, in the Central District of California, to Northern Arizona, in the District of Arizona.

10. AVALOS-MEJIA is a citizen of Mexico and present in the United States illegally. AVALOS-MEJIA has been charged with illegal re-entry into the United States at least three times. AVALOS-MEJIA is also known to use multiple aliases, to include Raul Soto-Meija, Pollo, Felipe Arturo Avalos-Mexia, Manuel Martinez, and Manuel Rameriz. AVALOS-MEJIA has a full extradition warrant, in the name Raul Soto-Meija, out of the District of Nevada for illegal re-entry (19-CR-00092-APG(PAL)).

11. AVALOS-MEJIA is believed to reside at or use addresses at 1451 Tremont Street, 1452 Tremont Street, 1453 Tremont Street, 1455 Tremont Street, 1456 Tremont Street, and 2119 Raymond Street, in Los Angeles, California.

12. In reviewing law enforcement wire transfer records, agents learned AVALOS-MEJIA has made several wire transfers to Mexico from the United States using several of his known aliases, to include Manuel Martinez, Manuel Rameriz, and other variations with the first name Manuel.

13. Between February 2022 and June 11, 2024, wire transfer data for the above Tremont Street addresses with known aliases show there were approximately 277 wire transfers from the United States to Mexico, for an aggregate approximate amount of \$258,014.

14. Despite the significant amount of money being sent to Mexico, in reviewing financial records, it does not appear AVALOS-MEJIA has any legitimate income in

Arizona and California.

June 8, 2023: Arizona Train Burglary

15. On June 8, 2023, your Affiant participated in the arrest of Eduardo Meza while he was burglarizing an eastbound BNSF train just west of Flagstaff, Arizona. When Eduardo Meza was encountered, he attempted to elude police. However, he was arrested after a brief foot pursuit. Subsequently, agents recovered approximately 600 pairs of Nike shoes that were stolen from a BNSF Train. When interviewed, Meza told your Affiant that he has participated in several BNSF train burglaries and gave details of how different groups burglarize BNSF trains. Meza stated AVALOS-MEJIA is a boss that oversees several train burglary groups. Further, Meza shared that AVALOS-MEJIA has scouts that locate trains to burglarize, and those scouts contact AVALOS-MEJIA who then makes the decision as to which BNSF trains to burglarize.

16. Law enforcement reviewed the contents of Meza's telephone and found several messages supporting Meza's statement. Several WhatsApp text messages were sent between Meza and a contact listed as "Pollo," an alias of AVALOS-MEJIA. These messages included exchanges of pictures of property that appears to be stolen from a BNSF train, to include Nike shoes and several different types of electronics. Additionally, your Affiant also observed several other WhatsApp messages between Meza and Pollo coordinating meeting locations and transportation in Northern Arizona, appearing to be in support of BNSF train burglaries.

July 11 – 12, 2023: Train Burglary

17. On July 11 and July 12, 2023, your Affiant participated in an operation where agents observed individuals burglarizing BNSF trains near Flagstaff, Arizona. During that operation, there were three separate pursuits of suspects that were attempting to evade law enforcement after they had burglarized an Eastbound BNSF train.

18. Edwin Rubio Damian and Cruz Antonio Garcia Zamora were subsequently observed loading 904 boxes of Turtle Beach Stealth Pro Headsets, worth approximately \$596,621.92, from the BNSF railway East of Flagstaff, Arizona, into a big landscaping

style truck and transport the merchandise to a Motel 6 in Flagstaff, Arizona.

19. Damian and Zamora were subsequently arrested on state of Arizona burglary charges and the above stolen property was recovered.

20. Your Affiant obtained several recorded calls from Enforcement and Removal Operations (ERO) made and received by Damian. Flagstaff Police Department Detective Carlos Leyva translate the calls from the Spanish language to the English language and below is a summary of the calls:

- a. An individual, identified as “Gael,” tells Damian the other day “Luis” called him stating that Pollo told him that we needed to pay for the vehicle they lost. Your Affiant believes, based on the known facts and context, that AVALOS-MEJIA is holding Damian responsible for losing vehicles recovered during the law enforcement pursuits on July 11 and 12, 2023, near Flagstaff, Arizona.
- b. Gael stated Luis told him that Pollo needed them to pay the \$11,000 for the Lexus and other vehicle.
- c. Damian told Gael they can help pay for some of the cost but not the total. He mentioned paying \$1,700 each. Damian mentions Pollo owes them \$600 each for the Lexus.

February 2024: Recovery of Train Theft Vehicle

21. In February of 2024, a blue Jeep Wrangler was encountered by Arizona Department of Public Safety Troopers near Flagstaff, Arizona, during a BNSF train burglary event. Your Affiant later learned the occupants of the blue Jeep Wrangler were identified as being contacted and/or arrested by law enforcement during other BNSF train burglaries.

22. On April 4, 2024, the same blue Jeep Wrangler was recovered by the Los Angeles Police Department Vehicle Theft Taskforce from a residence located at 2119 Raymond Street, Los Angeles, California, which is the same address AVALOS-MEJIA has used as a cellular phone subscriber address for several prepaid cellular devices.

March 1, 2024: Train Theft

23. Your Affiant learned the following from Navajo County Sheriff's Office (NCSO) Detective Sergeant Wayne Lesperance regarding a March 1, 2024, BNSF burglary:

- a. On March 1, 2024, the Navajo County Sheriff's office interrupted a train burglary in progress between Winslow, Arizona, and Joseph City, Arizona. A call for service came from a citizen near the BNSF tracks, and they observed several pick-up trucks dropping off multiple individuals who were then observed cutting the locks on the containers being transported on a BNSF train.
- b. At the time the five BNSF train burglars were arrested, they were driving a Nissan pickup. Several of the burglars were wearing camouflage gear and had burglary tools, such as bolt cutters and grinders within the Nissan pickup. Agents recovered six boxes of Disney NBC Jack Squish that was stolen from the BNSF train before the interruption.
- c. A video from a nearby business captured a white Ram Rebel and a black Ram TRX driving back and forth at a high rate of speed after dropping off individuals that subsequently burglarized the BNSF train.
- d. It was believed at the time of the burglary, the black Ram TRX was in the control of AVALOS-MEJIA. It appeared that the white Ram Rebel and a black Ram TRX were attempting to distract law enforcement from arresting the five BNSF train burglars.

24. During the arrest of the five BNSF train burglars, NCSO dispatch received a 911 call from AVALOS-MEJIA's cellular number. During the call, AVALOS-MEJIA claimed someone in a white SUV pointed a gun at him on the Interstate and he needed a law enforcement response.

25. It is your Affiant's belief that AVALOS-MEJIA was attempting to distract or redirect law enforcement away from the BNSF burglary events by placing a false 911

call for service.

March 15, 2024: Train Theft

26. On March 15, 2024, your Affiant arrested Deni Misraim Baez-Trejo and Erubiel Fierro Trejo near Flagstaff, Arizona, while transporting \$84,000 worth of stolen Nike shoes that were stolen from a BNSF train. During an interview of Baez-Trejo he offered the following:

- a. Baez-Trejo stated that Pollo offered him \$500 to transport merchandise that was stolen from a BNSF train and during that time Pollo was driving a black Ram TRX.
- b. Baez-Trejo stated that he was present during the burglary event on March 1, 2024. Baez-Trejo stated Pollo was also present during the March 1, 2024, BNSF burglary event, and Pollo was driving a black Ram TRX.

April 13, 2024: Train Theft

27. On April 13, 2024, your Affiant arrested Francisco Javier Arana Nieblas after a foot pursuit over several lanes of traffic on Interstate 40 near Flagstaff, Arizona. Nieblas was possessing and transporting 1,188 pairs of stolen Nike shoes worth \$225,720 in a GMC box truck with a fake, temporary California license plate. The Nike shoes were stolen from an Eastbound BNSF train in New Mexico.

28. Your Affiant reviewed Nieblas's cellular telephone and learned the following:

- a. On March 18, 2024, Nieblas sent a WhatsApp message to AVALOS-MEJIA, stating "This is the truck" along with an image of a counterfeit California temporary license plate of XE05725. On the counterfeit license plate, VIN 1GDJG31R6V1078648 was visible. Your Affiant reviewed pictures of the counterfeit license plate sent to AVALOS-MEJIA and the pictures of the GMC box truck Nieblas was arrested in and your Affiant believes they are the same vehicle based on the color and condition of the bumper in both pictures.

b. On March 19, 2024, an individual only identified as “Leo” sends a WhatsApp message to Nieblas stating, “Can I bring you oil for Pollo’s TRx.” Your Affiant believes this is another message showing that AVALOS-MEJIA was in control of the black Ram TRX during the March 1, 2024, burglary of a BNSF train. On March 23, 2024, Nieblas shared his location with AVALOS-MEJIA, which was near Joseph City, Arizona.

29. Your Affiant checked open-source mapping for that shared-location and learned it is an offramp on Interstate 40 and is approximately 650 feet away from the BNSF tracks. Your Affiant believes that AVALOS-MEJIA and Nieblas’ only reason to be along the Interstate 40 along the BNSF tracks is in furtherance of BNSF train burglaries.

30. BNSF Special Agent Derrick Porter told your Affiant that on March 23, 2024, BNSF air support spotted merchandise on the ground near Winslow, Arizona, but there was no report regarding the recovery of that merchandise. Special Agent Derrick Porter also told your Affiant that on March 23, 2024, there were several BNSF train doors open near east of Winslow, Arizona, toward Joseph City, Arizona. However, the train master would not stop the train to verify if containers were burglarized.

31. A cellular phone tracker warrant for a Cellular Telephone in use by AVALOS-MEJIA was sought and approved by the United States District Court in Flagstaff, Arizona on April 17, 2024, and expired on May 31, 2024.

32. Your Affiant analyzed the tracking details from the Cellular Telephone data during the above time and learned that the Cellular Telephone in use by AVALOS-MEJIA had been active near several BNSF train burglaries.

April 23, 2023: California Train Burglary

33. As an example, on April 23, 2023, California Highway Patrol Detective Chris Garot told your Affiant he was surveilling approximately fifteen suspects that were in control of several stolen vehicles. The tracking data associated with AVALOS-MEJIA placed him at this event. During surveillance, he observed the fifteen suspects staging on

the BNSF railway in the Cajon pass near Victorville, California.

34. Detective Garot told your Affiant that during the surveillance, AVALOS-MEJIA arrived with other unidentified suspects and was in control of a stolen Grey Audi Q8. Detective Garot told your Affiant that once the BNSF train arrived at the location where the fifteen suspects were staged, the train stopped, and he observed the fifteen suspects get on the train and attempt burglarize it. Detective Garot told your Affiant that a police helicopter spooked the suspects, so they got off the train and attempted to depart the area.

35. Detective Garot told your Affiant when they attempted to interdict the fifteen suspects, and after several pursuits, they apprehended six suspects, but AVALOS-MEJIA evaded police. Your Affiant later learned that it appeared several members of a BNSF train burglary crew got on the BNSF train in Riverside, California, and when the BNSF train neared the fifteen suspects, the riders on the BNSF train disabled the train by cutting an air hose which made the train go into an emergency stop and allowed the above suspects access to the BNSF train at the location they wanted.

May and June 2024: Stolen Vehicles

36. Detective Garot told your Affiant that over the last month they have conducted surveillance of approximately twenty stolen vehicles that appear to be in the control of AVALOS-MEJIA and members of his BNSF train burglary crew. Detective Garot told your Affiant that during those surveillance operations, he has observed AVALOS-MEJIA in approximately three separate stolen vehicles.

37. Detective Garot has surveilled AVALOS-MEJIA on approximately ten separate times while AVALOS-MEJIA and other suspects were following BNSF trains in California. BNSF Special Agent Porter told your Affiant that during the above surveillances, there were several attempted BNSF train burglaries.

May 7, 2024: Merchandise Transport

38. Detective Garot told your Affiant that agents had a tracking device on a known bus that has been used to transport stolen merchandise from BNSF trains.

Detective Garot told your Affiant that on May 7, 2024, pings from the above tracking device were at a US Storage facility located at 6655 Atlantic Avenue, Long Beach, California. Detective Garot shared that when investigators went to the above US Storage facility, they learned AVALOS-MEJIA had a storage unit that was no longer active due to failure to pay the bill and that storage unit was now empty.

39. AVALOS-MEJIA rented the storage unit in the name of Manuel Zamorano-Rameriz, which is a known alias for AVALOS-MEJIA. Detective Garot obtained a copy of a picture of the Mexican driver's license used to rent the storage unit. The identification was in the name of Manuel Zamorano-Rameriz with a picture resembling AVALOS-MEJIA and that identification was counterfeit.

40. Additionally, Detective Garot obtained a picture taken by US Storage depicting AVALOS-MEJIA when they rented it to him. AVALOS-MEJIA was wearing a hat with the initials "JGL" with the number "701" with colors of the Mexican flag. Your Affiant knows that JGL are the initials for Joaquin Guzman Loera, a.k.a. Chapo Guzman. Your Affiant knows that 701 refers to the rank Joaquin Guzman Loera once held on Forbes list of the world's richest people. Your Affiant knows Joaquin Guzman Loera was the head of the Sinaloa Cartel. However, he has since been convicted in the United States for several United States Code violations and was sentenced to life imprisonment without the possibility of parole plus 30 years. Based on your Affiant's training and experience, I know that individuals who idolize narco lore such as JGL 701 and or the criminal elements surrounding narco lore, are usually involved in similar conduct.

June 20, 2024: Take Down and Apprehension

41. On June 20, 2024, California local law enforcement agencies in conjunction with California HSI agents executed search warrants at 11 residences and 16 storage units related to the ongoing train burglaries and vehicle thefts in California and Arizona.

- a. As a result of law enforcement's execution of the residential search warrants mentioned above, approximately 43 suspects were arrested. Additionally, law enforcement seized approximately 41 vehicles, 700

pounds of methamphetamine (including liquid methamphetamine and the chemicals to refine methamphetamine), 17 firearms, and thousands of dollars' worth of miscellaneous merchandise believed to have been stolen from BNSF trains.

- b. As result of the storage unit search warrants, law enforcement seized approximately \$3,000,000 of merchandise believed to have been stolen from BNSF trains.

42. During the June 20, 2024, attempted apprehension of AVALOS-MEJIA, AVALOS-MEJIA led law enforcement on a four-hour pursuit that started in a vehicle and continued after AVALOS-MEJIA bailed out on foot in a mountainous area and successfully evaded law enforcement on foot.

43. At the same location AVALOS-MEJIA initially fled from, a search warrant was executed, and agents recovered from 74 stolen Nike cases, 108 packs of Nike socks and 35 pairs of individual Nike Shoes, worth a total of \$94,659. Agents also seized approximately ten stolen vehicles known to have been used in prior BNSF train burglaries, as well as several firearms.

44. AVALOS-MEJIA was also seen several times prior to the take down at a dirt lot located at 1110 2nd Street, San Bernardino, California.

- a. This address is a known location where BNSF train burglar crews' stage prior to going out to burglarize trains and an ending point where stolen train merchandise is staged.
- b. During the June 20, 2024, take down operation, a search warrant was served at the 1110 2nd Street address and agents seized approximately 100 boxes of merchandise stolen from a BNSF train. Agents also seized a box truck that has been used to transport merchandise that was burglarized from a BNSF train. Inside the seized box truck was more merchandise that had been stolen from a BNSF train.

45. In connection with the June 20, 2024, take down operation, law enforcement

encountered and interviewed Raquel Ruiz Torres. Agent Porter, who was involved in the takedown operation, told your Affiant the following information regarding the interview:

- a. Torres has known Pollo for about one year and they currently have a romantic relationship. Torres said she was first introduced to Pollo through Xiochi Ibarra at the fruit and juice restaurant in Compton, California where Ibarra works. Torres said she learned, through Ibarra, that Pollo makes his money by breaking into trains. Torres stated she believed there were Nikes shoes at her residence.
- b. Torres stated that Pollo had brought the Nike shoes into her house and hid cash behind her bed.

46. On June 20, 2024, in connection with the take down operation described above, law enforcement executed a search warrant at Torres's residence in Compton, California, and seized \$10,000.00 in cash and numerous boxes of stolen Nike shoes.

47. On June 20, 2024, in connection with the take down operation described above, law enforcement encountered and interviewed Xochi Apolonia Guerrero Corrales. Agent Porter told your Affiant the following about the interview:

- a. Corrales told agents she has known Pollo for nine years. Corrales stated Pollo comes to her business often, sometimes by himself and other times with other individuals. Corrales described one individual who associates with Pollo as "Poncho," who is identified as Erik Saenz. Corrales stated she knows Saenz because he has a baby in common with her daughter.
- b. Corrales stated when Pollo comes to her business, he drops off money for her to hold. Corrales stated Pollo pays her one hundred dollars each time he drops off money. Corrales stated Pollo comes to her business very often to drop money off for her to hold. Corrales stated she has been holding money for Pollo for about the last nine months. Corrales stated Pollo forces her to hold the money.
- c. Corrales stated she is afraid of Pollo because he has killed people in the

past, and she is afraid he will kill her.

48. That same day, law enforcement also executed a search warrant of Corrales's residence and seized approximately \$75,000 in bulk United States currency from Corrales's safe.

49. Pursuant to additional warrants served and executed during the June 20, 2024, take down operation, agents seized what is believed to be a stolen white Ram Rebel and a stolen black Ram TRX. Your Affiant believes the stolen black Ram TRX is the same vehicle believed to be in the control of AVALOS-MEJIA during several BNSF burglary events in Arizona described above, including those burglaries occurring on March 1, March 15, and March 23, 2024.

50. On June 21, 2024, agents located AVALOS-MEJIA along with Eric Saenz and Justin Correa at a restaurant in Huntington Park, California. Agents arrested the three subjects after Correa attempted to flee on foot. During the arrests agents seized approximately \$100,000 bulk United States currency that was in their possession.

51. Detective Garot was involved in the June 21, 2024, apprehension of the above listed subjects, and told your Affiant the following information regarding their arrests:

- a. Agents located AVALOS-MEJIA along with Saenz, Correa, and a fourth unidentified Hispanic male at a restaurant in Huntington Park, California. A Spanish speaking undercover agent went inside the restaurant and overheard the four above individuals in what appeared to be a meeting. The undercover agent also overheard conversation about something that happened "yesterday," June 20, 2024. Your Affiant believes they were talking about the attempted apprehension of AVALOS-MEJIA as well the execution of several search warrants.
- b. When agents approached the restaurant, the unidentified Hispanic male walked out the front door of the restaurant while AVALOS-MEJIA, Saenz, and Correa walked out the side door of the restaurant. Once agents attempted to apprehend the four subjects, Correa attempted to flee on foot

while carrying a Louis Vuitton bag. Agents pursued Correa for several blocks until he was apprehended in a store. Agents located the same Louis Vuitton bag next to where Correa was arrested. A search of the bag revealed keys to a stolen vehicle that was parked near the restaurant and approximately \$120,000 in bulk United States currency. Also located within the Louis Vuitton bag was a detailed ledger that listed Nike and other merchandise that is typically burglarized from BNSF trains, as well as dollar amounts detailing what the merchandise is worth and for what it is sold.

52. Based on the seizures and all the above-mentioned evidence, AVALOS-MEJIA has acted as the leader of these burglar crews. Aside from directing the crews, both in person and through cellular communication, he has also supplied vehicles, paid the crews, and facilitated the sale of the merchandise stolen from Arizona trains.

CONCLUSION

53. For these reasons, your Affiant submits that there is probable cause to believe Felipe Arturo AVALOS-MEJIA committed the crime of Possession or Receipt of Goods Stolen from Interstate Shipment, Aid and Abet, in violation of Title 18, United States Code (U.S.C.) §§ 659 and 2.

54. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Chris Foster 06-23-2024

CHRIS FOSTER
Special Agent
Homeland Security Investigations

Sworn to and subscribed electronically this 23rd day of June, 2024.

HONORABLE CAMILLE D. BIBLES
United States Magistrate Judge